

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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IN RE:	:	
	:	Chapter 13
PIERRE R PAUL	:	
	:	Case No. 20-14528-MDC
Debtor.	:	

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**MOTION TO MODIFY PLAN AFTER CONFIRMATION**

Pierre R Paul (the “Debtor”), by and through their undersigned counsel, hereby move to modify their Chapter 13 Plan and in support thereof aver as follows:

1. The Debtor filed a Chapter 13 Bankruptcy on or about November 23, 2020 (the “Petition Date”).
2. The Chapter 13 Plan was confirmed by this Honorable Court on or about March 16, 2021.
3. The Debtor owns real property located at 7517 Maryland Street, Philadelphia, PA 19138 (the “Property”).
4. The Property is encumbered by a mortgage held by MidFirst Bank (“MidFirst”).
5. On or about July 31, 2023, the Debtor was offered a partial claim by the Department of Housing and Urban Development, through MidFirst, for the purpose of curing post-petition mortgage arrears (the “Partial Claim”).
6. On August 1, 2023, the Debtor filed a Motion to Approve the Partial Claim. [Docket No. 42]
7. Accordingly, the Debtor is filing the instant Motion to Modify their chapter 13 plan to provide for payment of attorneys’ fees incurred in connection with the

Motion to Approve the Partial Claim, and to bring the Debtor current in payments to the chapter 13 trustee.

8. The Debtor has paid \$6,821.00 to the Chapter 13 Trustee to date.

9. The Modified Chapter 13 Plan will provide for plan payments in the amount of \$338.00 per month for 28 months for a new base amount of \$16,285.65.

WHEREFORE, Debtor, by the undersigned counsel, respectfully requests this Honorable Court to enter an Order Modifying the Chapter 13 Plan.

Dated: August 1, 2023

/s/Brad J. Sadek, Esq  
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